

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

IN RE:	§	
	§	Case No. 14-60147
KEVIN BAUCOM (xxx-xx-2908)	§	
APRIL BAUCOM (xxx-xx-4486)	§	
	§	
Debtors	§	Chapter 13

**AMENDED MOTION TO MODIFY CONFIRMED MODIFIED PLAN**

**NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN OBJECTION IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AND SERVED UPON THE PARTY FILING THIS MOTION WITHIN TWENTY-EIGHT (28) DAYS FROM DATE OF SERVICE UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH OBJECTION. IF NO OBJECTION IS TIMELY SERVED AND FILED, THIS PLEADING SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF AN OBJECTION IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SET A HEARING. IF YOU FAIL TO APPEAR AT THE HEARING, YOUR OBJECTION MAY BE STRICKEN. THE COURT RESERVES THE RIGHT TO SET A HEARING ON ANY MATTER.**

COME NOW, Debtors, by the undersigned attorney and moves the following:

1. On March 3, 2014 (the Petition Date) and date of entry of the Order for Relief, Kevin Baucom and April Baucom filed a voluntary petition for bankruptcy relief under Chapter 13 of the United States Bankruptcy Code. On August 18, 2014, the Debtor's Chapter 13 Plan was confirmed by the Court. [Dkt. 46].
2. Debtors' modified their plan, which was confirmed on August 12, 2015. [Dkt. No. 85]. On June 13, 2016, the Court confirmed Debtor's second modified plan which provided for treatment of the IRS's amended claim. [Dkt. No. 103].
3. Due to health problems and other unexpected expenses of the Debtors, Debtors have fallen behind in their plan payments to the chapter 13 trustee. Debtors seek to modify their plan in

order to cure the arrearages in plan payments.

4. Debtors' counsel seeks attorney's fees in the amount of \$600.00 for preparation of Debtor's modified plan, consultations with clients, photocopies, postage, and other related expenses.

WHEREFORE, Debtor respectfully prays that the Court approve and confirm Debtor's motion to modify confirmed plan.

Respectfully submitted,  
AMES LAW FIRM, PLLC

By: /s/ Amy Bates Ames  
Amy Bates Ames  
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#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the above and foregoing document shall be served via electronic means, if available, otherwise by regular, first class mail, postage prepaid to all parties listed on the mailing matrix on or before May 9, 2017

/s/ Amy Bates Ames  
Amy Bates